

JAN. 05 1994

Mr. Stephen J. Henderson  
Plant Manager  
Monsanto Chemical Company  
1700 South Second Street  
St. Louis, Missouri 63177-7040

Dear Mr. Henderson:

RE: RFI Phase II Soil Sampling

The Environmental Protection Agency (EPA) is in receipt of the letter sent to us from Jo Hanson, Project Manager, dated December 13, 1993.

The first item addressed concerns PCB soil sampling procedures. It is our understanding from your letter that Monsanto proposes to not use the PCB field test kits for screening and delineation purposes. In place of using field test kits for screening and delineation, Monsanto proposes to use the Standard Operating Procedure (SOP) developed by Monsanto's Environmental Sciences Center which would utilize the GC method of analysis. The EPA is in agreement that this proposed method of analysis for field screening and delineation of PCBs is acceptable.

The PCB analytical procedure which was enclosed with the December 13 letter (ESC-SOP-93- UT-609) has been reviewed by the EPA and is acceptable; however, there are some items in this procedure which require clarification. Please provide written clarification to the EPA for the following items before using this procedure for RFI activities at the J.F. Queeny facility.

**Page 5, Section 6.** This section does not specify applicable holding times, if any, from sample collection to extraction for environmental samples. Please provide holding time information.

**Page 7, section 8.** This section does not indicate the specific alternate criteria for the initial calibration analyses if acceptance criteria is not met. Also, it appears to only address the initial calibration and not continuing calibrations. The frequency, acceptance criteria, and alternate criteria for continuing calibrations should be clearly stated.

WSTM:RCRA:PRMT:PREITZ:LH:X7658:1-4-94:G:MQRFILTR.PAR

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STEWART

*T. Reitz*

*K. Bello*

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RCRA RECORDS CENTER

Page 10, Section 11. This section does not indicate the specific acceptance criteria for the matrix spike (MS) and does not outline the alternate criteria if acceptance criteria is not met. In addition, it does not indicate whether matrix spike duplicates (MSDs) are to be analyzed. The analysis of MSDs are recommended at the same frequency as the MS. The analysis of MS samples will provide useful accuracy data but not precision data. The analysis of MSDs would provide the precision data. The acceptance criteria, alternate criteria, and calculations to be utilized for the MS and MSD should be clearly specified.

The second item discussed in the December 13 letter concerns the parameters alachlor and VOCs, which are to be analyzed in the quarry area in addition to the other parameters specified in the approved Phase II RFI Work Plan. Upon consideration, the EPA requires a minimum of one sample from each boring in the quarry area for the analyses of VOCs and alachlor. If during field observations Monsanto or the EPA suspects elevated VOCs or alachlor in the quarry soil borings, it is recommended to collect additional samples for VOCs and alachlor.

If you have any questions concerning this letter, please call Pat Reitz, of my staff, at (913) 551-7674.

Sincerely yours,

Robert L. Stewart, P.E.  
Acting Chief, Permits Section  
RCRA Branch  
Waste Management Division

cc: Jo Hanson, Monsanto

bcc: Bill Greshan, Jacobs Engineering  
Randy Rohrman, GEOL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

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*for* Robert L. Stewart, P.E.  
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